

Exhibit B

Discovery Notice

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, THE
EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO, AND THE PUERTO RICO PUBLIC
BUILDINGS AUTHORITY,

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**NOTICE OF ENTRY OF ORDER ESTABLISHING, AMONG OTHER
THINGS, PROCEDURES AND DEADLINES CONCERNING OBJECTIONS
TO CONFIRMATION AND DISCOVERY IN CONNECTION THEREWITH**

THE COURT HAS ENTERED AN ORDER ESTABLISHING PROCEDURES, DATES AND DEADLINES IN CONNECTION WITH THE CONFIRMATION HEARING ON THE DEBTORS' PROPOSED PLAN OF ADJUSTMENT. THE DATES AND DEADLINES SET FORTH HEREIN ARE PREMISED ON AN ORDER APPROVING THE DISCLOSURE STATEMENT BEING ISSUED BY THE END OF JULY, 2021, AND MAY BE ADJUSTED IF THE DISCLOSURE STATEMENT IS APPROVED SUBSEQUENTLY. THIS IS NOT A SOLICITATION OF VOTES ON THE PROPOSED PLAN. YOU SHOULD REVIEW THIS NOTICE AND THE ATTACHED ORDER IN ITS ENTIRETY.

If you have any questions regarding this notice, please contact Prime Clerk LLC by telephone at (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available), or by email at puertoricoinfo@primeclerk.com.

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. The Financial Oversight and Management Board has filed, on behalf of the Debtors, the *Fifth Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.*, dated July 12, 2021 [ECF No. 17306] (as the same may be amended or modified, including all exhibits and supplements thereto, the “Plan”).

2. ***Issuance of Confirmation Procedures Order.*** On [____], 2021, the United States District Court for the District of Puerto Rico (the “Court”) entered an order [ECF No. ____] (the “Amended Procedures Order”) establishing, among other things, procedures and deadlines concerning objections to confirmation of the Plan and discovery in connection therewith.

3. ***Deadline to File Notice of Objection.*** If you wish to participate in discovery in connection with confirmation of the Plan, you must file a notice of your intention to object to confirmation of the Plan (an “Objection Notice”) **on or before August 3, 2021** (the “Objection Notice Deadline”).

4. The Objection Notice must:

- a. Be in writing, in English, and be signed;
- b. State your name, address, the nature of your Claim, and your Claim number;
- c. State your intention to object to confirmation of the Plan and participate in discovery in connection therewith; and
- d. Be filed electronically with the Court on the docket of *In re Commonwealth of Puerto Rico*, Case No. 17 BK 3293-LTS, through the Court’s case filing system on or before the Objection Notice Deadline.

- i. If you are not represented by counsel, you may instead mail your Objection Notice to the Court’s Clerk’s office at:

United States District Court, Clerk’s Office
150 Ave. Carlos Chardon Ste. 150
San Juan, P.R. 00918-1767

so as to be received on or before the Objection Notice Deadline.

5. **You must timely file an Objection Notice to participate in discovery in connection with confirmation of the Plan.** Failure to timely file an Objection Notice, however, will not preclude you from filing an objection to confirmation of the Plan on or before the confirmation Objection Deadline (as defined below), but will preclude you from taking discovery.

6. ***Discovery Dates and Deadlines.*** Pursuant to the Amended Procedures Order, the Court has established discovery dates and deadlines applicable to parties who have timely filed an Objection Notice and are eligible to participate in discovery, including the following:

Summary of Certain Discovery Deadlines	
August 3, 2021	Deadline for Creditors to File Objection Notice
	Deadline for Debtors to File Preliminary Fact Witness List
	Deadline for Debtors to File Opening Summary Brief
August 6, 2021	Deadline to Serve Initial Requests for Production of Documents (All Parties)
September 6, 2021	Deadline for Creditors to File Preliminary Fact Witness List
	Deadline to File Opening Expert Disclosures (All Parties)
September 13, 2021	Deadline to File Opening Expert Reports (All Parties)
October 1, 2021	Deadline to File Interrogatories (All Parties)
	Deadline to File Follow-Up Production Requests (All Parties)
October 4, 2021	Deadline to File Rebuttal Expert Disclosures (All Parties)
October 8, 2021	Deadline for Debtors to File Initial Proposed Confirmation Order
October 11, 2021	Deadline to File Admission Requests (All Parties)
	Close of Fact Discovery
October __, 2021	Deadline to File Rebuttal Expert Reports (All Parties)
October 18, 2021	Close of Expert Discovery
October 19, 2021	Deadline for Creditors to File Objections to Confirmation of the Plan
October 22, 2021	Deadline for Creditors to File Objections to Debtors' Initial Proposed Confirmation Order
	Deadline to File Finalized Witness Lists, Exhibit Lists and Deposition Designations (All Parties)

Summary of Certain Discovery Deadlines	
October 25, 2021	Deadline for Debtors to File Replies to Objections to Confirmation of the Plan
	Deadline to File Witness Declarations to Be Used at the Confirmation Hearing (All Parties)
	Deadline for Debtors to File Initial Proposed Findings of Fact and Conclusions of Law in Support of Confirmation of the Plan
October 29, 2021	Deadline for Debtors to File Replies in Support of Proposed Confirmation Order
November 8, 2021	Start of Confirmation Hearing

7. The dates and deadlines set forth herein are premised on an order approving the Disclosure Statement being issued by the end of July, 2021, and may be adjusted if the Disclosure Statement is subsequently approved. You will receive additional notices with additional information regarding further proceedings in connection with confirmation of the Plan at a later date.

8. ***Plan Confirmation Depository.*** Information and documents relating to confirmation of the Plan are available online in the Plan Confirmation Depository at titleiiplandataroom.com.

9. ***Additional Information.*** Any party in interest wishing to obtain information about the Amended Procedures Order or copies of the Plan, including Spanish translations thereof, should contact Prime Clerk LLC, by telephone at (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available), or by email at puertoricoinfo@primeclerk.com, or may view such documents by accessing either <https://cases.primeclerk.com/puertorico/> or the Court's website, <https://www.prd.uscourts.gov/>. Please note that a Public Access to Court Electronic Records ("PACER") (<http://www.pacer.psc.uscourts.gov>) password and login are needed to access documents on the Court's website.

Dated: July 16, 2021
San Juan, Puerto Rico

Respectfully submitted,

/s/ Martin J. Bienenstock

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